

EXHIBIT A

Rudwin Ayala x31665

From: Angelina Rodriguez x23161
Sent: Wednesday, July 3, 2024 3:14 PM
To: Angie Hinrichs; Sandy Corrigan; Eugene M. LaFlamme
Cc: Rudwin Ayala x31665; Samantha Leroy x23123; Jillian L. Lukens; Jared B. Giroux
Subject: RE: 13320575 - Stephanie Wadsworth et al. v. Walmart, Inc. and Jetson Electric Bikes, LLC- Deposition Request

Angie,

Dr. Lewis has not responded with dates of availability yet. They're cooperating and I will provide dates once they respond.

Dr. Nelson at High Plains PT is who needs to be subpoenaed.

Thank you,

Angelina Rodriguez
Litigation Paralegal

T: (689) 219-2530
F: (689) 219-2482
20 N Orange Ave, Suite 1600,
Orlando, FL 32801



\$20B+ Recovered • 1,000+ Attorneys • 120+ Offices

A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.

From: Angie Hinrichs <ahinrichs@mlllaw.com>
Sent: Wednesday, July 3, 2024 1:27 PM
To: Sandy Corrigan <scorrigan@mlllaw.com>; Angelina Rodriguez x23161 <angelinarodriguez@forthepeople.com>; Eugene M. LaFlamme <elaflamme@mlllaw.com>
Cc: Rudwin Ayala x31665 <rayala@forthepeople.com>; Samantha Leroy x23123 <sleroy@forthepeople.com>; Jillian L. Lukens <jlukens@mlllaw.com>; Jared B. Giroux <JGiroux@mlllaw.com>
Subject: RE: 13320575 - Stephanie Wadsworth et al. v. Walmart, Inc. and Jetson Electric Bikes, LLC- Deposition Request

Good afternoon Angelina,

Attached you will find a Subpoena and Notice of Deposition for Dr. Giovanni Lewis from the University of Utah on July 23, 2024 with respect to the above-referenced matter. Please let our office know if we will need to have Dr. Lewis formally served with the attached Subpoena.

Thank you,

Angie Hinrichs | Legal Assistant

McCoy Leavitt Laskey LLC

Phone: 262-522-7000 (Office)
262-522-7028 (Direct)
Email: ahinrichs@mlllaw.com

From: Sandy Corrigan <scorrigan@mlllaw.com>

Sent: Wednesday, July 3, 2024 9:26 AM

To: Angie Hinrichs <ahinrichs@mlllaw.com>; Angelina Rodriguez x23161 <angelinarodriguez@forthepeople.com>; Eugene M. LaFlamme <elaflamme@mlllaw.com>

Cc: Rudwin Ayala x31665 <rayala@forthepeople.com>; Samanda Leroy x23123 <sleroy@forthepeople.com>; Jillian L. Lukens <jlukens@mlllaw.com>; Jared B. Giroux <JGiroux@mlllaw.com>

Subject: RE: 13320575 - Stephanie Wadsworth et al. v. Walmart, Inc. and Jetson Electric Bikes, LLC- Deposition Request

Good Morning, because Angie is amazing, she took care of this before I caught my error. This is a Duces Tecum. We would just ask that Dr. Sulentic bring his file with him for his deposition for review.

Sandy Corrigan | Litigation Paralegal

McCoy Leavitt Laskey LLC

Phone: 262-522-7000 (Office)
262-522-7016 (Direct)
Email: scorrigan@mlllaw.com

From: Angie Hinrichs <ahinrichs@mlllaw.com>

Sent: Wednesday, July 3, 2024 9:20 AM

To: Angelina Rodriguez x23161 <angelinarodriguez@forthepeople.com>; Eugene M. LaFlamme <elaflamme@mlllaw.com>

Cc: Sandy Corrigan <scorrigan@mlllaw.com>; Rudwin Ayala x31665 <rayala@forthepeople.com>; Samanda Leroy x23123 <sleroy@forthepeople.com>; Jillian L. Lukens <jlukens@mlllaw.com>; Jared B. Giroux <JGiroux@mlllaw.com>

Subject: RE: 13320575 - Stephanie Wadsworth et al. v. Walmart, Inc. and Jetson Electric Bikes, LLC- Deposition Request

Good morning,

Please see the attached Notice of Deposition for Dr. Sulentic on 7/22/24 in the above-referenced matter. The Zoom link information will be forwarded upon receipt.

Thank you,

Angie Hinrichs | Legal Assistant

Phone: 262-522-7028 (Direct)
262-522-7000 (Office)

From: Angelina Rodriguez x23161 <angelinarodriguez@forthepeople.com>

Sent: Tuesday, July 2, 2024 2:42 PM

To: Eugene M. LaFlamme <elaflamme@mlllaw.com>

Cc: Sandy Corrigan <scorrigan@mlllaw.com>; Rudwin Ayala x31665 <rayala@forthepeople.com>; Samanda Leroy x23123 <sleroy@forthepeople.com>; Angie Hinrichs <ahinrichs@mlllaw.com>; Jillian L. Lukens <jlukens@mlllaw.com>; Jared B. Giroux <JGiroux@mlllaw.com>

Subject: RE: 13320575 - Stephanie Wadsworth et al. v. Walmart, Inc. and Jetson Electric Bikes, LLC- Deposition Request

Eugene,

Correct, please forward the notice of deposition for Dr. Sulentich and we will forward over to their office with the zoom link.

The University of Utah doctors will need to be subpoenaed.

Angelina Rodriguez
Litigation Paralegal

T: (689) 219-2530
F: (689) 219-2482

20 N Orange Ave, Suite 1600,
Orlando, FL 32801



\$20B+ Recovered • 1,000+ Attorneys • 120+ Offices

A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.

From: Eugene M. LaFlamme <elaflamme@mlllaw.com>

Sent: Tuesday, July 2, 2024 8:46 AM

To: Angelina Rodriguez x23161 <angelinarodriguez@forthepeople.com>

Cc: Sandy Corrigan <scorrigan@mlllaw.com>; Rudwin Ayala x31665 <rayala@forthepeople.com>; Samanda Leroy x23123 <sleroy@forthepeople.com>; Angie Hinrichs <ahinrichs@mlllaw.com>; Jillian L. Lukens <jlukens@mlllaw.com>; Jared B. Giroux <JGiroux@mlllaw.com>

Subject: RE: 13320575 - Stephanie Wadsworth et al. v. Walmart, Inc. and Jetson Electric Bikes, LLC- Deposition Request

Angelina,

This will go out today. I presume we do not need to formally serve the Dr. Sulentich with the subpoena since you have been in contact with them?

Please also let us know if we need to formally serve the University of Utah doctors.

Eugene

Eugene M. LaFlamme | Partner
McCoy Leavitt Laskey LLC

Phone: 262-522-7000 (Office)
262-522-7026 (Direct)
414-232-1561 (Mobile)

Email: elaflamme@mlllaw.com

From: Angelina Rodriguez x23161 <angelinarodriguez@forthepeople.com>

Sent: Friday, June 28, 2024 9:46 AM

To: Eugene M. LaFlamme <elaflamme@mlllaw.com>

Cc: Sandy Corrigan <scorrigan@mlllaw.com>; Rudwin Ayala x31665 <rayala@forthepeople.com>; Samanda Leroy x23123 <sleroy@forthepeople.com>; Angie Hinrichs <ahinrichs@mlllaw.com>; Jillian L. Lukens <jlukens@mlllaw.com>;

Jared B. Giroux <JGiroux@mlllaw.com>

Subject: RE: 13320575 - Stephanie Wadsworth et al. v. Walmart, Inc. and Jetson Electric Bikes, LLC- Deposition Request

Good morning,

I have asked the Doctor to hold 7/22 at 12:00 PM MST.

Please forward the notice and zoom link.

Thank you,

Angelina Rodriguez
Litigation Paralegal

T: (689) 219-2530

F: (689) 219-2482

20 N Orange Ave, Suite 1600,
Orlando, FL 32801



\$20B+ Recovered • 1,000+ Attorneys • 120+ Offices

A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.

From: Eugene M. LaFlamme <elaflamme@mlllaw.com>

Sent: Thursday, June 27, 2024 5:05 PM

To: Angelina Rodriguez x23161 <angelinarodriguez@forthepeople.com>

Cc: Sandy Corrigan <scorrigan@mlllaw.com>; Rudwin Ayala x31665 <rayala@forthepeople.com>; Samanda Leroy x23123 <sleroy@forthepeople.com>; Angie Hinrichs <ahinrichs@mlllaw.com>; Jillian L. Lukens <jlukens@mlllaw.com>; Jared B. Giroux <JGiroux@mlllaw.com>

Subject: Re: 13320575 - Stephanie Wadsworth et al. v. Walmart, Inc. and Jetson Electric Bikes, LLC- Deposition Request

July 22 let's do.

Eugene LaFlamme

(414) 232-1561

Sent from my iPhone

Eugene M. LaFlamme | Partner

McCoy Leavitt Laskey LLC

Phone: 262-522-7000 (Office)

262-522-7026 (Direct)

414-232-1561 (Mobile)

Email: elaflamme@mlllaw.com

On Jun 27, 2024, at 3:44 PM, Angelina Rodriguez x23161

<angelinarodriguez@forthepeople.com> wrote:

Dr. Sulentic has responded with the following updated dates:

July 22 @ 12:00pm MST

July 23 @ 12:00pm MST

July 24 @ 11:40am MST

Angelina Rodriguez
Litigation Paralegal

T: (689) 219-2530

F: (689) 219-2482

20 N Orange Ave, Suite 1600,
Orlando, FL 32801

[<mmlogo_4d481f35-1840-4531-86f0-09098b1154be.png>](#)

\$20B+ Recovered • 1,000+ Attorneys • 120+ Offices

A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.

From: Angelina Rodriguez x23161 <angelinarodriguez@forthepeople.com>

Sent: Thursday, June 27, 2024 4:28 PM

To: Eugene M. LaFlamme <elaflamme@mlllaw.com>

Cc: Sandy Corrigan <scorrigan@mlllaw.com>; Rudwin Ayala x31665 <rayala@forthepeople.com>;
Samantha Leroy x23123 <sleroy@forthepeople.com>; Angie Hinrichs <ahinrichs@mlllaw.com>; Jillian L.
Lukens <jlukens@mlllaw.com>; Jared B. Giroux <JGiroux@mlllaw.com>

Subject: RE: 13320575 - Stephanie Wadsworth et al. v. Walmart, Inc. and Jetson Electric Bikes, LLC-
Deposition Request

My apologies, lets hold off on these dates for a moment. I advised the doctor of the length of the deposition and they're going to provide new dates/times to accommodate a 2 hour deposition.

Angelina Rodriguez
Litigation Paralegal

T: (689) 219-2530

F: (689) 219-2482

20 N Orange Ave, Suite 1600,
Orlando, FL 32801

[<image001.png>](#)

\$20B+ Recovered • 1,000+ Attorneys • 120+ Offices

A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.

From: Eugene M. LaFlamme <elaflamme@mlllaw.com>

Sent: Thursday, June 27, 2024 3:33 PM

To: Angelina Rodriguez x23161 <angelinarodriguez@forthepeople.com>

Cc: Sandy Corrigan <scorrigan@mlllaw.com>; Rudwin Ayala x31665 <rayala@forthepeople.com>;
Samantha Leroy x23123 <sleroy@forthepeople.com>; Angie Hinrichs <ahinrichs@mlllaw.com>; Jillian L.
Lukens <jlukens@mlllaw.com>; Jared B. Giroux <JGiroux@mlllaw.com>
Subject: Re: 13320575 - Stephanie Wadsworth et al. v. Walmart, Inc. and Jetson Electric Bikes, LLC-
Deposition Request

The fee is fine. I don't expect it to go more than 1-2 hours. If plaintiffs prep the doc though then that plaintiffs would be responsible for that fee which I presume is fine as well.

Let's do July 16.

Eugene

Eugene LaFlamme
(414) 232-1561
Sent from my iPhone

Eugene M. LaFlamme | Partner
McCoy Leavitt Laskey LLC
Phone: 262-522-7000 (Office)
262-522-7026 (Direct)
414-232-1561 (Mobile)
Email: elaflamme@mlllaw.com

On Jun 27, 2024, at 2:22 PM, Angelina Rodriguez x23161
<angelinarodriguez@forthepeople.com> wrote:

Mr. LaFlamme,

Dr. Sulentic responded with the following dates, and he would charge \$600/hour for the deposition fee.

July 10 at 1:00pm MST
July 16 at 1:00pm MST
July 22 at 12:20pm MST

Angelina Rodriguez
Litigation Paralegal

T: (689) 219-2530
F: (689) 219-2482

20 N Orange Ave, Suite 1600,
Orlando, FL 32801

[<mmllogo_4d481f35-1840-4531-86f0-09098b1154be.png>](#)

\$20B+ Recovered • 1,000+ Attorneys • 120+ Offices

A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.

From: Rudwin Ayala x31665 <rayala@forthepeople.com>
Sent: Thursday, June 27, 2024 9:53 AM
To: Eugene M. LaFlamme <elaflamme@mlllaw.com>
Cc: Sandy Corrigan <scorrigan@mlllaw.com>; Samantha Leroy x23123 <sleroy@forthepeople.com>; Angelina Rodriguez x23161 <angelinarodriguez@forthepeople.com>; Angie Hinrichs <ahinrichs@mlllaw.com>; Jillian L. Lukens <jlukens@mlllaw.com>; Jared B. Giroux <JGiroux@mlllaw.com>
Subject: RE: 13320575 - Stephanie Wadsworth et al. v. Walmart, Inc. and Jetson Electric Bikes, LLC- Deposition Request

Angelina,

Please send Eugene and Sandy the form the risk manager at Utah sent that she requested be sent to her. Thanks.

Rudwin Ayala
Attorney

T: (561) 764-2220
F: (561) 764-2270

1700 Palm Beach Lakes Blvd, Suite 500,
West Palm Beach, FL 33401

<[image001.png](#)>

\$20B+ Recovered • 1,000+ Attorneys • 120+ Offices

A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.

From: Eugene M. LaFlamme <elaflamme@mlllaw.com>
Sent: Thursday, June 27, 2024 9:48 AM
To: Rudwin Ayala x31665 <rayala@forthepeople.com>
Cc: Sandy Corrigan <scorrigan@mlllaw.com>; Samantha Leroy x23123 <sleroy@forthepeople.com>; Angelina Rodriguez x23161 <angelinarodriguez@forthepeople.com>; Angie Hinrichs <ahinrichs@mlllaw.com>; Jillian L. Lukens <jlukens@mlllaw.com>; Jared B. Giroux <JGiroux@mlllaw.com>
Subject: Re: 13320575 - Stephanie Wadsworth et al. v. Walmart, Inc. and Jetson Electric Bikes, LLC- Deposition Request

Sandy,

Please issue some subpoenas this week for the University of Utah docs for July 22-23?

Eugene

Eugene LaFlamme
(414) 232-1561

Sent from my iPhone

Eugene M. LaFlamme | Partner

McCoy Leavitt Laskey LLC

Phone: 262-522-7000 (Office)

262-522-7026 (Direct)

414-232-1561 (Mobile)

Email: elaflamme@mlllaw.com

On Jun 27, 2024, at 8:33 AM, Rudwin Ayala x31665

<rayala@forthepeople.com> wrote:

I am available July 2nd in the morning, and 22, 23, and 30th.

I have a trial scheduled for August 13th week (about 2 week trial). If it doesn't go, then my August will have some availability. Let me get with my experts and some dates from them and then I'll shoot them over. Thanks.

Rudwin Ayala

Attorney

T: (561) 764-2220

F: (561) 764-2270

1700 Palm Beach Lakes Blvd, Suite 500,
West Palm Beach, FL 33401

[!\[\]\(9db214d549b9aeebe72aa11d3a5c4b1a_img.jpg\)_4d481f35-1840-4531-86f0-09098b1154be.png](#)

\$20B+ Recovered • 1,000+ Attorneys • 120+ Offices

A referral is the best compliment. If you know anyone that needs our help, please have them call our office

From: Eugene M. LaFlamme <elaflamme@mlllaw.com>

Sent: Thursday, June 27, 2024 9:17 AM

To: Rudwin Ayala x31665 <rayala@forthepeople.com>; Sandy Corrigan

<scorrigan@mlllaw.com>; Samantha Leroy x23123

<sleroy@forthepeople.com>; Angelina Rodriguez x23161

<angelinarodriguez@forthepeople.com>

Cc: Angie Hinrichs <ahinrichs@mlllaw.com>; Jillian L. Lukens

<jlukens@mlllaw.com>; Jared B. Giroux <JGiroux@mlllaw.com>

Subject: RE: 13320575 - Stephanie Wadsworth et al. v. Walmart, Inc. and Jetson Electric Bikes, LLC- Deposition Request

CAUTION: Use caution when clicking on links or opening attachments in this external email.

Since these will be remote, I could do July 2, 8, 15, 16, 22, 23, and 30.

We should also start to set aside some dates for your experts in late July/August. I'm guessing you have around 7(?) experts. Can you start to pull together dates for them as well?

I have copied my partner Jared Giroux on this email as well as he may get involved with some expert deps.

Eugene

Eugene M. LaFlamme | Partner

McCoy Leavitt Laskey LLC

Phone: 262-522-7000 (Office)
262-522-7026 (Direct)
414-232-1561 (Mobile)

Email: elaflamme@mlllaw.com

From: Rudwin Ayala x31665 <rayala@forthepeople.com>

Sent: Tuesday, June 25, 2024 3:14 PM

To: Eugene M. LaFlamme <elaflamme@mlllaw.com>; Sandy Corrigan <scorrigan@mlllaw.com>; Samanda Leroy x23123 <sleroy@forthepeople.com>; Angelina Rodriguez x23161 <angelinarodriguez@forthepeople.com>

Subject: Fwd: 13320575 - Stephanie Wadsworth et al. v. Walmart, Inc. and Jetson Electric Bikes, LLC- Deposition Request

Eugene,

I figured some would play hardball, for whatever reason. I guess let's take dates we're available and subpoena these folks.

The risk manager for the University of Utah providers reached back out today with a whole list of information they are seeking. We're compiling as much of it as we can. Just asking a lot of questions such as whether they'll get paid, who's taking the deposition, how long will it last, etc. We'll get that to them by the end of today or tomorrow and see how cooperative they are from there.

Rudwin Ayala

Attorney

T: (561) 764-2220

F: (561) 764-2270

1700 Palm Beach Lakes Blvd, Suite 500,
West Palm Beach, FL 33401

<[image001.png](#)>

\$20B+ Recovered • 1,000+ Attorneys • 120+ Offices

A referral is the best compliment. If you know anyone that needs our help, please have them call our office

From: Angelina Rodriguez x23161
<angelinarodriguez@forthepeople.com>
Sent: Tuesday, June 25, 2024 11:03:47 AM
To: mnelson@usphclinic.com <mnelson@usphclinic.com>
Cc: Samanda Leroy x23123 <sleroy@forthepeople.com>; Rudwin Ayala x31665 <rayala@forthepeople.com>; Eitan J. Goldrosen x28639 <egoldrosen@forthepeople.com>
Subject: RE: 13320575 - Stephanie Wadsworth et al. v. Walmart, Inc. and Jetson Electric Bikes, LLC- Deposition Request

Good morning Dr. Nelson,

Thank you for your response. We will advise opposing counsel of your communication. They will likely go ahead and subpoena you for deposition on a date they're available.

If you have any questions, feel free to give me a call.

Angelina Rodriguez
Litigation Paralegal

T: (689) 219-2530
F: (689) 219-2482

20 N Orange Ave, Suite 1600,
Orlando, FL 32801

<[image001.png](#)>

\$20B+ Recovered • 1,000+ Attorneys • 120+ Offices

A referral is the best compliment. If you know anyone that needs our help, please have them call our office

From: mnelson@usphclinic.com <mnelson@usphclinic.com>
Sent: Tuesday, June 25, 2024 12:07 AM
To: Angelina Rodriguez x23161 <angelinarodriguez@forthepeople.com>
Subject: RE: 13320575 - Stephanie Wadsworth et al. v. Walmart, Inc. and Jetson Electric Bikes, LLC- Deposition Request

You don't often get email from mnelson@usphclinic.com. [Learn why this is important](#)

In reviewing with my legal counsel, it has been recommended that I refrain from testifying at this time. I am not interested in doing so and never committed to do so.

Thanks,

Michael Nelson

CONFIDENTIALITY NOTICE: This e-mail message including attachments, if any, is intended for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any unauthorized review, use, disclosure, or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. Thank you.